Case 1:05-cv-11840-MLW Document 24 Filed 10/26/2005 Page 1 of 3

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS		FILED OFFICE
		2005 OCT 26 P 12: 53
		U.S. DISTRICT COURT DISTRICT OF MASS.
AMERICAN REINSURANCE COMPANY, et al., Plaintiffs, v.))) () CIVIL ACTIO) 05-CV-11840	
AMERICAN INTERNATIONAL GROUP and TRENWICK AMERICA REINSURANCE CORPORATION, Defendants.))))	

JOINT MOTION FOR ENTRY OF BRIEFING SCHEDULE

Pursuant to Fed.R.Civ.P. 6 and Local District Court Rule 7.1(B), Plaintiff American Reinsurance Co., et al. ("Am Re") and Defendants American International Group, Inc. on behalf of its relevant member and associated companies ("AIG, Inc.") and Trenwick America Reinsurance Corporation ("Trenwick") jointly request that the Court enter the following briefing schedule with respect to certain pending motions:

- 1. AIG, Inc. and Trenwick will serve their oppositions to Am Re's Motion to Remand [Dkt. No. 12] by November 10, 2005.
- 2. AIG, Inc. and Trenwick will serve their reply briefs in support of their Motions to Stay Proceedings Pending Arbitration [Dkt. Nos. 3, 9] by November 10, 2005.
- 3. Am Re will serve its reply briefs in support of its Motion to Remand [Dkt. No. 12] by December 5, 2005.

As grounds for this request, Am Re, AIG, Inc. and Trenwick respectfully state that the time requested is reasonable and necessary in light of the issues presented in these motions and

the schedules of counsel. Further, Am Re, AIG, Inc. and Trenwick request that the Court permit them to file reply briefs with respect to their respective motions so that all relevant matters are presented to the Court prior to decision.

AMERICAN INTERNATIONAL GROUP, INC. on behalf of its relevant member and associated companies,

John T. Harding BBO #221270

MORRISON MAHONEY LLP

250 Summer Street Boston, MA 02210

(617) 439-7558

(617) 342-4888 (facsimile)

Of Counsel:

William A. Maher

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue New York, New York 10110 (212) 382-3300

(212) 382-0050 (facsimile)

TRENWICK AMERICA REINSURANCE CORP.

By its attorneys,

Eben A. Krim, Esq.

PROSKAUER ROSE LLP

Elen A. Krin

One International Place, 22nd Floor Boston, MA 02110

(617) 526-9700

(617)526-9899 (facsimile)

Margaret Dale, Esq. (pro hac vice)

PROSKAUER ROSE LLP

1585 Broadway

New York, NY 10036-8299

(212) 956-9064

(212)969-2900 (facsimile)

AMERICAN REINSURANCE CO.

By its attorneys:

Steven L. Schreckinger, Esq. BBO #447100
Palmer & Dodge
111 Huntington Ave.
Boston, MA 02199

Of Counsel:

Kathy McFarland, Esq. Robin C. Dusek, Esq. LOVELLS One IBM Plaza 330 North Wabash Ave – Suite 1900 Chicago, IL 60611 (312) 832-4400

Dated: October 26, 2005

CERTIFICATE OF SERVICE

I, John T. Harding, counsel for Defendant American International Group, hereby certify that on October 26, 2005, I served a copy of the foregoing document by first class mail on all known counsel of record.

John T. Harding